

MERRICK GARLAND
United States Attorney General

NEIL SINGH
Arizona State Bar No. 021327
BROCK HEATHCOTTE
Arizona State Bar No. 014466
Special Assistant U.S. Attorneys
Two Renaissance Square
40 North Central Avenue, Suite 1800
Phoenix, Arizona 85004-4449
Telephone: (602) 514-7500
Facsimile: (602) 514-7693
Neil.Singh@usdoj.gov
Brock.Heathcotte@usdoj.gov

Attorneys for Defendant United States

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

Todd C. Engel,

Plaintiff,

v.

United States of America, *et al.*,

Defendants.

No. 2:22-cv-01040-WQH-EJY

**UNOPPOSED MOTION TO EXTEND
TIME TO FILE RESPONSIVE
PLEADING

(SECOND REQUEST)**

Defendant United States of America hereby moves pursuant to Federal Rule of Civil Procedure 6(b)(1) and Local Rule LR IA 6-1, for a 17-day extension of time to November 21, 2022, to file a responsive pleading to Plaintiff's Complaint (Doc. 1). Plaintiffs do not oppose this motion. This is Defendant's second requested extension of time in this matter. Defendant previously moved unopposed for an extension to November 4, 2022 due to counsel's heavy schedule, trial, and vacation. (Doc. 19.) That motion was granted by Court Order. (Doc. 21.)

The reason for this second requested extension is that counsel Heathcotte for the United States was ordered by the court in another matter to produce supplemental briefing

1 due November 8, 2022, and co-counsel Singh has unexpectedly been assigned to handle a
2 trial in another matter he has never worked on beginning Monday November 7, 2022, due
3 to another AUSAs sudden leave for a death in the family. For these reasons, counsel seek
4 additional time to complete Defendant's responsive pleading. The case styled *Joseph*
5 *O'Shaughnessy, et al. v. United States of America, et al*, 2:22-cv-01039-WQH, concerns
6 many of the same events and the same attorneys as the above captioned case and was filed
7 the same day. An identical unopposed motion to extend has been filed in the *O'Shaughnessy*
8 case.

9 Undersigned counsel Singh affirms that Plaintiff's counsel Marquiz consents to the
10 granting of this motion.

11 For the foregoing reasons, Defendant respectfully requests that the deadline to file
12 a responsive pleading to the Complaint be extended to November 21, 2022.

13 RESPECTFULLY SUBMITTED this November 2, 2022.

14
15 MERRICK GARLAND
16 United States Attorney General

17 s/ Neil Singh
18 NEIL SINGH
19 BROCK HEATHCOTTE
20 Special Assistant United States Attorneys, Acting
21 Under Authority Conferred by 28 U.S.C. § 515
22 Attorneys for Defendant United States

23 IT IS SO ORDERED:

24 
25 UNITED STATES MAGISTRATE JUDGE

26 DATED: November 2, 2022